

1 [Firm Name and address]

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5 Attorneys for defendants B and C
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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
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14 PLAINTIFFS 1, 2, AND 3,) Case No. **CV 9*-****-*** (**x)
15 Plaintiffs,)
16 v.) JOINT STIPULATION ON MOTION OF
17 DEFENDANTS A, B, AND C,) DEFENDANT C TO COMPEL PLAINTIFF 2
18 Defendants.) TO ANSWER INTERROGATORIES 9, 17,
19) AND 21-23
20)
21) Hearing Date: _____
22) Time: _____
23) Place: Courtroom [6A/6B]
24) Before Mag. Judge [Edwards/
25) Nakazato]

26 Defendant C's Introduction:

27 [State only enough about the case so that it will be reasonably
28 apparent why the particular discovery sought in the interrogatories
is needed to litigate the case.]

[Avoid argument, hyperbole, and attempts to evoke sympathy.]

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1 [Leave out statements about meeting and conferring unless
2 opposing party refused to meet. It is assumed that counsel did meet
3 and confer.]

4 Plaintiff 2's Introduction.

5 [If you agree with above, simply say so. Otherwise, correct any
6 erroneous statements and add any additional information that is
7 needed to understand what the case is about that is not clear from
8 the above and is needed to understand the general context of your
9 resistance to the discovery.]

10 [If there are inconsistent statements between defendant's
11 introduction and plaintiff's introduction, a declaration is necessary
12 to prove the point. The Court will not assume one attorney is
13 correct and the other is not.]

14 The Interrogatories in Issue:

15 Interrogatory 9 from defendant C to plaintiff 2:

16 [Quote interrogatory as served. If parties agreed at the meet-
17 and-confer to construe certain language in the interrogatory, the
18 agreed-upon construction should follow the interrogatory.]

19 Plaintiff 2's response to Interrogatory 9:

20 [Quote response as served.]

21 Defendant C's contentions:

22 "Defendant C offered at the meet-and-confer to resolve the
23 dispute over the interrogatory by _____."

24 [State contentions and legal authorities why the information sought
25 is discoverable.]

26 Plaintiff 2's contentions:

27 "Plaintiff 2 offered at the meet-and-confer to resolve the
28 dispute over this interrogatory by _____."

1 The interrogatory is objectionable because: [contentions]
2 [If undue burden or the like is contended, a declaration must
3 be attached quantifying the expected burden.]

4 Interrogatory 17 from defendant C to plaintiff 2:

5 [Same format as above.]

6 Interrogatory 21 from defendant C to plaintiff 2:

7 [Same format as above.]

8 Interrogatory 22 from defendant C to plaintiff 2:

9 [Same format as above.]

10 Interrogatory 23 from defendant C to plaintiff 2:

11 [Same format as above.]

12 Defendant C's conclusion:

13 Plaintiff 2 should be ordered to respond forthwith, without
14 objections, to interrogatories 9, 17, and 21-23.

15 Plaintiff 2's conclusion:

16 Defendant C's motion should be denied.

17 Alternatively, plaintiff 2 should not be compelled to respond
18 beyond what it offered at the meet-and-confer and it should be
19 permitted at least 10 days to gather the information.

20 Respectfully submitted,

21 [Dated:]

[FIRM NAME]

23 By: _____

24 Attorney

Attorneys for defendants B and C

25 [Dated:]

[FIRM NAME]

27 By: _____

28 Attorney

Attorneys plaintiff 2